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ATTORNEY FOR PLAINTIFFS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ROBERT ARGENTINA and	:	
MARIE ARGENTINA, h/w,	:	
	:	
Plaintiffs,	:	CIVIL ACTION
	:	
vs.	:	NO.: 02-CV-3192
	:	
MYCONE DENTAL SUPPLY	:	
COMPANY, INCORPORATED t/a	:	
NATIONAL KEYSTONE INDUSTRIES,	:	
and	:	
WILLIAM DIXON COMPANY	:	
division of GROBERT USA,	:	
	:	
Defendants.	:	
	:	

PLAINTIFFS' MOTION FOR CONTINUANCE

Plaintiffs, Robert and Marie Argentina, by and through their counsel, Howard B. Segal, Esquire, respectfully requests this Court adjourn the arbitration currently scheduled for October 9, 2002, and reschedule that arbitration to a day at least 120 days from the date of this Motion.

In support thereof, Plaintiffs aver as follows:

1. Plaintiff, Robert Argentina, sustained personal injuries when a junior alcohol burner manufactured, distributed and sold by the Defendants caught on fire.
2. On or about April 25, 2002, Plaintiffs filed a personal injury claim against Defendants based upon theories of products liability, negligence and breach of warranty.

3. This matter was originally filed in the Court of Common Pleas of Philadelphia County and removed by the Defendants this Court.

4. Initially, the arbitration date was scheduled for October 9, 2002.

5. Defendant, Mycone, recently had the product at issue inspected by an expert and a report has yet to be received. The Plaintiffs are also having said product inspected by an expert for purposes of this litigation.

6. Because of the nature of this matter, and the multiple depositions that must be accomplished, Plaintiffs request additional time, to accomplish same.

7. Counsel for Plaintiffs has discussed this Motion for continuance with counsel for Defendants and there is no opposition to same.

8. Because of foregoing, Plaintiffs will be severely prejudice presenting their case unless the arbitration date currently scheduled for October 9, 2002, is adjourned.

9. Therefore, Plaintiffs respectfully request that the Arbitration scheduled for October 9, 2002 be adjourned and rescheduled to a date at least 120 days from the date of this Motion.

HOWARD B. SEGAL, ESQUIRE
Attorney for Plaintiffs,
Robert Argentina and
Marie Argentina

Dated: September 5, 2002